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November 8, 2019

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Unlicensed Use of the 6 GHz Band, ET Docket No. 18-295;  
Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz,  
GN Docket No. 17-183***

Dear Ms. Dortch:

On November 6, 2019, Colleen King of Charter Communications, Inc. (Charter), Brian Josef of Comcast Corporation (Comcast), Jennifer Prime of Cox Enterprises, Inc., Renee Gregory of Willkie Farr & Gallagher LLP (representing NCTA – The Internet & Television Association (NCTA)), and Jacqueline Clary and myself of NCTA met with OET staff listed below regarding the above-referenced dockets. Elizabeth Andrion and Praveen Srivastava of Charter and Joseph Attanasio of Comcast participated in the meeting by telephone.

Consistent with NCTA's previous advocacy in this proceeding,<sup>1</sup> NCTA and its member companies expressed support for authorizing unlicensed use of the full 1200 megahertz of 6 GHz spectrum provided that existing incumbent operations can be fully protected. In particular, we urged the Commission to move forward in the near term with authorizing low-power, indoor (LPI) use throughout all 6 GHz sub-bands without requiring Automated Frequency Coordination (AFC). LPI use presents the least risk of harmful interference to incumbents due to building attenuation, as the technical studies on the record demonstrate. Unlicensed LPI operations across all 1200 MHz of the band would also be an incredibly powerful tool to relieve congestion in existing Wi-Fi bands, support 5G deployment by providing much-needed capacity, and bring Wi-Fi 6 equipment to consumers.

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<sup>1</sup> See, e.g., Comments of NCTA – The Internet & Television Association, ET Docket No. 18-295, GN Docket No. 17-183 (filed Feb. 15, 2019); Reply Comments of NCTA – The Internet & Television Association, ET Docket No. 18-295, GN Docket No. 17-183 (filed March 18, 2019); Letter from Danielle J. Piñeres, NCTA – The Internet & Television Association, to Marlene H. Dortch, Secretary, FCC, ET Docket No. 18-295, GN Docket No. 17-183 (Aug. 26, 2019).

NCTA also encouraged the Commission to adopt additional measures to ensure that LPI devices protect incumbents from harmful interference. First, to ensure that indoor devices stay indoors, NCTA supported the following methods: (1) prohibiting the use of removable antennas; (2) requiring that devices must be plugged in; (3) requiring that devices cannot be weatherproofed; and (4) requiring that such devices be labeled “indoor only.”<sup>2</sup> We also reiterated our view that the equipment authorization process may serve as a good vehicle to enforce an indoor-only restriction. Second, we opined that the Commission can help to facilitate coexistence in U-NII-6 and U-NII-8 among indoor mobile/portable BAS and wireless microphone operations and LPI unlicensed devices by requiring that LPI deployments at stadiums, conference centers, and other large event venues be subject to coordination with the designated frequency coordinator for the venue.

Please address any questions regarding the foregoing to the undersigned.

Sincerely,

**/s/ Danielle J. Piñeres**

Danielle J. Piñeres

cc: Julius Knapp  
Bahman Badipour  
Michael Ha  
Paul Murray  
Nicholas Oros  
Barbara Pavon  
Hugh Van Tuyl  
Aole Wilkins El

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<sup>2</sup> See, e.g., Comments of Apple Inc., Broadcom Inc., Cisco Systems, Inc., Facebook, Inc., Google LLC, Hewlett Packard Enterprise, Intel Corporation, Marvell Semiconductor, Inc., Microsoft Corporation, Qualcomm Incorporated, and Ruckus Networks, an Arris Company, ET Docket No. 18-295, GN Docket No. 17-183, at 32 (Feb. 15, 2019).